

RECEIVED FLDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL

MI JL 19 A S 40.

July 12, 2007

Jeff J Jordan, Esq Supervisory Attorney Office of General Counsel Federal Elections Commission 999 E Street, NW Washington, DC 20463

MUR# 5927

Re <u>P-MUR 443</u>

Dear Mr Jordan

Please consider this letter to be the response of The Beacon Mutual Insurance Company ("Beacon") to the request made in your letter dated June 11, 2007 to James W Ryan, Esq who serves as outside counsel to Beacon. The purpose of this letter is to follow up on previous correspondence and, pursuant to the provisions of 11 C F R § 111 4, file a formal complaint on behalf of Beacon against the former President and Chief Executive Officer Joseph A Solomon with regard to potential violations of the Federal Election Campaign Act, as amended (the "Act")

In November 2006, as a result of a Market Conduct Examination being conducted by the Rhode Island Department of Business Regulation, it came to the attention of the Beacon Board of Directors that Mr. Solomon, may have violated federal campaign laws by the manner in which he solicited members of senior management for donations to the campaign of a candidate for federal office. Several members of senior management at Beacon have stated that Mr. Solomon offered to personally reimburse them for campaign contributions to a federal election campaign. At least two of those employees were actually reimbursed. This conduct would appear to constitute a violation of 2 U S C § 441f (Prohibitions of Contributions in Name of Another). Beacon has previously provided you with copies of statements from the individuals involved.



If you have any questions or need any further assistance, please contact Mr Ryan at (401) 861-8232

The Beacon Mutual Insurance Company,

By James V Rossti, President & CEO

Subscribed and sworn to before me July \_15\_, 2007

Notary Public BAIAN T SALEN My Commission Expires 4 12 11

JVR/emw cc James W Ryan, Esq

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